

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
:
v. :
:
MARIIA BUTINA, :
Also known as Maria Butina, :
:
Defendant. :

NOTICE OF FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby respectfully submits a corrected version of the Statement of Offense, as directed by the Court at the sentencing hearing on April 26, 2019.

Respectfully submitted,

JESSIE K. LIU
UNITED STATES ATTORNEY
D.C. Bar Number 472845

By: _____ /s/
ERIK M. KENERSON
Assistant United States Attorney
Ohio Bar Number 82960
United States Attorney's Office
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: 202-252-7201
Email: erik.kenerson@usdoj.gov

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
	:	Criminal Case: 18-218 (TSC)
v.	:	
	:	
	:	
MARIIA BUTINA, also known as	:	
MARIA BUTINA,	:	
	:	
Defendant.	:	

STATEMENT OF OFFENSE

Pursuant to the Federal Rules of Criminal Procedure 11, the United States and Defendant Maria Butina (“Butina”) stipulate and agree that the following facts are true and accurate. These facts do not constitute all facts known to the parties concerning the charged offense and covered conduct. This statement is being submitted by the parties to demonstrate that sufficient facts exist to establish that the defendant committed the offense to which she is pleading guilty.

Statement of Facts

The government’s evidence includes, but is not limited to, the following:

Maria V. Butina, also known as Maria Butina, is a citizen of the Russian Federation. U.S. Person 1 is a United States citizen. Beginning no later than March of 2015, Butina and U.S. Person 1 agreed and conspired, with a Russian government official (“Russian Official”) and at least one other person, for Butina to act in the United States under the direction of Russian Official without prior notification to the Attorney General. Russian Official has served as the Deputy Governor to the Russian Central Bank since at least 2015. He previously served as the First Deputy Chairman of the Federation Council of the Russian Federation. Butina knows Russian Official.

With U.S. Person 1's assistance and subject to Russian Official's direction, Butina sought to establish unofficial lines of communication with Americans having power and influence over U.S. politics. Butina sought to use those unofficial lines of communication for the benefit of the Russian Federation, acting through Russian Official.

In furtherance of the conspiracy, Butina drafted a proposal in March of 2015 titled *Description of the Diplomacy Project*. In it, Butina downplayed the possibility of influencing U.S. foreign policy toward Russia through official channels, criticizing government unwillingness to compromise. As an alternative, Butina suggested that Russia could use unofficial channels of communication to the same end. Butina then cast herself as a possible unofficial transmitter of communications between Russia and the United States. Further, Butina opined that the circumstances were favorable for building relations with a certain U.S. political party (hereafter, "Political Party #1"). Butina predicted that the candidate nominated by Political Party #1 would likely win the upcoming U.S. presidential election. Pointing to her recent travel to the United States, her experience, and her attendance at conferences organized by a certain U.S. civil society gun rights organization (hereafter, "Gun Rights Organization), which Butina posited had influence over Political Party #1, Butina stated she had laid the groundwork for an unofficial channel of communication with the next U.S. administration. For example, Butina listed actions she had already taken, including being introduced to leaders of Political Party #1 as an unofficial representative of Russian Official. She also identified in her proposal a series of upcoming conferences associated with Political Party #1 that she could attend to further the goal.

The *Description of the Diplomacy Project* was drafted by Butina with U.S. Person 1's assistance. U.S. Person 1 assisted with the proposal by providing Butina with information about prominent U.S. political figures and a forecast of the upcoming presidential election. U.S. Person 1

also assisted by providing information about Vladimir Pozner, a Russian media commentator who, as described in the proposal, had served as the “unofficial transmitter” of the policies of Mikhail Gorbachev and Boris Yeltsin in the United States. Butina sent a Google-translated version of the proposal to U.S. Person 1 once drafted and asked for U.S. Person 1’s advice on it, which he agreed to provide.

Butina sent the proposal to Russian Official and others. As part of the proposal, she requested \$125,000 from a Russian billionaire to attend the conferences identified in the proposal and “separate meetings with interested parties” — including other Russian businessmen or persons at the Russian Ministry of Foreign Affairs (the “MFA”) — to help “determine where the focus of Russian interests lies [sic] in cooperating with the US.” Butina informed U.S. Person 1 that she was meeting with Russian Official and others about the proposal. Russian Official informed Butina that her proposal would be supported, at least in part.

Without prior notification to the Attorney General, Butina then took steps to achieve the object of her agreement with U.S. Person 1. For example, in April of 2015, Butina travelled to the United States to attend a Gun Rights Organization convention. There, Butina highlighted her experience as a gun rights advocate in Russia to gain the attention of the Gun Rights Organization and its members. She was introduced to influential members of Political Party #1, one of whom announced his campaign to run for the presidency of the United States shortly thereafter.

Butina also invited powerful members of the Gun Rights Organization to Moscow to advance her agenda. Before they arrived, U.S. Person 1 provided Butina with background information on the invitees, including his assessment on their degree of political influence in the United States. The members came to Moscow in December of 2015. During the trip, the Gun Rights Organization members met with high-level Russian government officials as arranged by

Russian Official. Prior to the visit, Butina stressed the importance of a political program as part of the trip and asked Russian Official to set up meetings with high-level Russian politicians. After their visit, Butina sent Russian Official a message in Russian, referring to members of the Gun Rights Organization, which has been variously translated as saying, “We should let them express their gratitude now, we will put pressure on them quietly later,” and “We should allow them to express their gratitude now, and then quietly press.”

Butina also assisted a wealthy and well-connected U.S. person in hosting multiple, large “friendship dinners” where other wealthy and influential Americans discussed U.S.-Russian relations. Butina used these “friendship dinners” to cultivate lines of communications with individuals she believed would have the ear of the next U.S. presidential administration. At these dinners, Butina was able to meet individuals with political capital, learn their thoughts and inclinations toward Russia, gauge their responses to her, and adjust her pitch accordingly. In March of 2016 prior to the first of these dinners, Butina told Russian Official about potential American attendees to one of the dinners, based on information Butina obtained from U.S. Person 1. Following that message, she emailed the wealthy, connected U.S. person, copying U.S. Person 1, to say “[Russian Official] is very impressed by you and expresses his great appreciation for what you are doing to restore the relations between the two countries. He also wants you to know that Russians will support the efforts from our side.”

In June of 2016, Butina received an F-1 student visa to enter the United States.¹ In connection with her application, Butina did not disclose that she would be acting as an agent of a foreign government official or otherwise would be working to establish channels of communication between Russian and American government officials.

¹ All available evidence indicates that Butina had interest in a graduate school education.

Also in furtherance of the conspiracy, Butina helped Russian Official organize a Russian delegation to the 2017 National Prayer Breakfast in Washington, D.C. Russian Official directed Butina to include certain people within the delegation and Butina complied with his instructions. Butina then emailed that list of delegation invitees to U.S. Person 1. Butina explained that the people on the list had been “hand-picked by [Russian Official] and me” and that they were “coming to establish a back channel of communication.” Later, U.S. Person 1 emailed another person, copying Butina, to say “Reaction to the delegation’s presence in America will be relayed DIRECTLY” (emphasis in original) to the Russian President and Foreign Minister.

Throughout the conspiracy, Butina wrote notes to Russian Official about her efforts and her assessment of the political landscape in the United States in advance of the 2016 election. Butina wrote some of these notes in response to specific requests from Russian Official. Others she wrote on her own. Butina also sought Russian Official’s advice on whether to take meetings with certain people. She asked him for direction on whether the Russian “government” was ready to meet with some of those people, and he asked her what she planned to do with her “contacts,” lest she and Russian Official be forgotten after the election.

Butina was aware that Russian Official sometimes acted in consultation with the MFA, in addition to his superiors at the Russian Central Bank. For example, in April of 2016, Russian Official tasked Butina with writing him a note to explain why he should be permitted to travel to the United States to attend the annual Gun Rights Organization meeting. She did as he directed, encouraging his attendance partly because of the opportunity to meet political candidates. Butina knew that Russian Official would share this note with his superiors at the Russian Central Bank and MFA to support a request that Russian Official be sent to the annual Gun Rights Organization meeting. In November of 2016, in response to a note from Butina about how to create a dialogue

with the then President-elect's advisors, Russian Official told her that he did not believe the MFA would "go for it."

Butina failed to notify the U.S. Attorney General that she would be acting in the United States as an agent of a foreign government official, as required by 18 U.S.C. § 951. At no time relevant to this proffer was Butina a duly accredited diplomatic or consular officer; an officially and publicly acknowledged and sponsored official or representative of the Russian Federation; or an officially and publicly acknowledged and sponsored staff member, employee, or representative thereof.

Finally, if this case had proceeded to trial, the government would have shown that Butina took one or more actions in furtherance of the conspiracy from within the District of Columbia.